

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**972 IRREVOCABLE TRUST and  
INTERMED GAS PRODUCTS, LLC,**

**Case No.: 08-CIV-4907 RPP-HP  
ECF CASE**

**Plaintiffs**

**v.**

**MICHAEL LAING, ROBERTA PUGLIESE,  
LAING HOLDINGS CORPORATION and  
INTERACTIVE MEDICAL TECHNOLOGIES, CORP.  
Defendants.**

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**DEFENDANTS' NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the Affidavits of Michael Laing and Roberta Pugliese, Defendants, MICHAEL LAING (hereinafter referred to as "LAING"), ROBERTA PUGLIESE (hereinafter referred to as "PUGLIESE"), LAING HOLDINGS CORPORATION (hereinafter referred to as "LHC"), INTERACTIVE MEDICAL TECHNOLOGIES, CORP. (hereinafter referred to as "IMT")(collectively hereinafter referred to as "Defendants"), will move this Court at a date and time to be determined by the Court, pursuant to the Federal Rules of Civil Procedure § 12(b)(2), 12(b)(3) and 12(b)(6), 28 U.S.C. §1404(a), for an Order dismissing Plaintiffs' Complaint in Part or in the Alternative, Motion to Transfer Venue to Southern District of Florida, and for such other relief as this Court deems just and proper; and

NOTICE IS FURTHER GIVEN that responses to the Motion, if any, shall be served to counsel for Defendants, Jeffrey M. Glotzer, P.A., 6111 Broken Sound Parkway, Suite 330, Boca Raton, Florida 33487, attention: Jeffrey M. Glotzer, Esq.

Dated June 3<sup>rd</sup>, 2008

s/ Jeffrey M. Glotzer  
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